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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

BUCKS COUNTY EMPLOYEES
RETIREMENT FUND, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NEWELL BRANDS INC., MICHAEL B.
POLK, RALPH J. NICOLETTI, and JAMES
L. CUNNINGHAM, III,

Defendants.

CIVIL ACTION NO.

2:18-cv-10878

**MOTION DAY: September 17,
2018**

MATTHEW BARNETT, Individually and on
Behalf of All Others Similarly Situated,

Plaintiff,

v.

NEWELL BRANDS INC., MICHAEL B.
POLK, RALPH J. NICOLETTI, and
JAMES L. CUNNINGHAM, III,

Defendants.

CIVIL ACTION NO.

2:18-cv-11132

**MOTION OF ELECTRICITY PENSIONS TRUSTEE LIMITED AS SCHEME
TRUSTEE OF THE ELECTRICITY SUPPLY PENSION SCHEME AND
CONSTRUCTION LABORERS PENSION TRUST FOR SOUTHERN CALIFORNIA
FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND
APPROVAL OF SELECTION OF COUNSEL**

Electricity Pensions Trustee Limited as Scheme Trustee of the Electricity Supply Pension Scheme (“ESPS”) and Construction Laborers Pension Trust for Southern California (“Southern California Laborers”) (together, “ESPS and Southern California Laborers”) respectfully move this Court pursuant to Section 21D(a)(3)(B) of the Securities Exchange Act of 1934 (the “Exchange Act”), 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), for the entry of an Order: (1) consolidating the above-captioned related actions pursuant to FED. R. CIV. P. 42(a); (2) appointing ESPS and Southern California Laborers as Lead Plaintiff on behalf of the Class of all purchasers of publicly traded Newell Brands Inc. (“Newell Brands” or the “Company”) securities between February 6, 2017 and January 24, 2018, inclusive (the “Class Period”); (3) approving ESPS and Southern California Laborers’ selection of Spector Roseman & Kodroff, P.C. and Labaton Sucharow LLP as Co-Lead Counsel for the Class, and Carella, Byrne, Cecchi, Olstein, Brody & Agnello P.C. as Liaison Counsel for the Class (the “Motion”); and (4) granting such other and further relief as the Court may deem just and proper.

This Motion is made on the grounds that ESPS and Southern California Laborers are the “most adequate plaintiff” under the PSLRA and should therefore be appointed Lead Plaintiff. ESPS and Southern California Laborers believe they have the “largest financial interest” in the relief sought by the Class in this action. ESPS and Southern California Laborers also otherwise satisfy the requirements of Rule 23 of the Federal Rules of Civil Procedure because their claims are typical of other Class members’ claims, and because they will fairly and adequately represent the Class. Further, ESPS and Southern California Laborers are the paradigmatic Lead Plaintiff envisioned by Congress in enacting the PSLRA because they are sophisticated institutional

investors with a substantial financial stake in the litigation who will provide effective monitoring and supervision of counsel.

This Motion is based upon the accompanying Memorandum of Law in support thereof, the Declaration of James E. Cecchi filed herewith, the pleadings and other filings herein, and such other written or oral argument as may be permitted by the Court.

DATED: August 20, 2018

Respectfully submitted,

/s/James E. Cecchi

James E. Cecchi

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Class*

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for Southern California and Proposed Co-Lead
Counsel for the Class*

LOCAL RULE 11.2 CERTIFICATION

I, James E. Cecchi, hereby certify that, to the best of my knowledge, the matter in controversy in the above-captioned actions is not the subject of any other action pending in any court, or of any pending arbitration or administrative proceeding.

CERTIFICATE OF SERVICE

I, James E. Cecchi, hereby certify that the Motion of Electricity Pensions Trustee Limited as Scheme Trustee of the Electricity Supply Pension Scheme and Construction Laborers Pension Trust for Southern California for Consolidation, Appointment as Lead Plaintiff and Approval of Selection of Counsel was filed through the ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: August 20, 2018

/s/ James E. Cecchi
James E. Cecchi